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October 30, 1998

Office of Special Nutritionals
HFS-450 Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
200 C St. SW
Washington DC 20204

Statement of Nutritional Support- MEN'S PM FORMULA OVER 40
Pursuant to 21 CFR Part 101.93, American Specialty Health &
Wellness (ASHW) files the following Statement of Nutritional
Support for the Dietary Supplement marketed as:
MEN'S PM FORMULA OVER 40

1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr.
Ste. 250, San Diego CA 92108

2) Text of Nutritional Support Statement being Made:
"Men's and women's AM-PM formulas contain a blend of vitamins,
minerals, and herbs specifically formulated to work with your
body's natural daily rhythms, so that nutrients are available when
the body needs them most."

3) Name of dietary ingredient: See Attached Product Label

4) Brand Name: Men's PM Formula Over 40

5) Substantiation information on file at the company office. The
corporate officer who can certify same is Dr. Doug Metz, Vice
President.

Yours truly,

A handwritten signature in cursive script, appearing to read "Doug Metz".

Dr. Doug Metz
Vice President

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PM

MEN'S PM FORMULA Over 40

Convenient Evening
Supplement for Men

Dietary Supplement 180 Tablets (60 Packets)



MEN'S PM FORMULA - Over 40 is free of wheat, corn, dairy, sucrose, starch, salt and yeast.

CAUTION/WARNING: Keep out of reach of children. As with any supplement, herb or medication, do not provide it to a child without consulting a physician. Not for use by pregnant or lactating women unless directed by a physician.

NOTE: This product is regulated by the FDA as a dietary supplement. If you have any questions about how you feel while taking this supplement, contact your physician. If you are taking any medication, have any disease or illness, consult your physician before taking this product. Do not stop or change prescribed medication without the permission or prescription of your physician.

STORAGE: Keep tightly closed in a cool, dry place.

DIRECTIONS FOR USE: As a dietary supplement, take one packet (3 tablets) with dinner and one packet at bedtime. Two packets at dinner.

DISTRIBUTED BY:
AMERICAN SPECIALTY HEALTH & WELLNESS
PO BOX 509017 SAN DIEGO, CA 92161-5601

S U P P L E M E N T F A C T S

Serving size: 2 packets (six tablets) Servings per container: 30

Six Tablets Provide:	Amt/Serving	% Daily Value
Vitamin A (as beta-carotene)	5000 IU	100%
Vitamin C (as ascorbic acid 100 mg, calcium ascorbate 100 mg, magnesium 100 mg, palmitate 25 mg, potassium 50 mg, sodium 25 mg)	400 mg	667%
Calcium (as amino chelate 125 mg and calcium Citrimal 125 mg)	250 mg	25%
Niacin (as niacinamide, granules)	125 mg	625%
Folate (as folic acid)	200 mcg	50%
Biotin	200 mcg	67%
Iodine (from Atlantic kelp)	150 mcg	100%
Magnesium (as amino chelate buffered)	100 mg	25%
Zinc (as zinc Chelazome® amino chelate)	20 mg	133%
Selenium (as L-selenomethionine)	100 mcg	143%
Copper (as copper Chelazome® amino chelate)	2 mg	100%
Manganese (as manganese Chelazome® amino chelate)	1 mg	50%
Chromium (as chromium Chelavite® amino chelate)	100mcg	83%
Alpha-ketoglutaric acid	62.5 mg	*
Alpha-lipoic acid	500 mcg	*
Apple pectin	100 mg	*
Betatene® mixed carotenoids (Dunaliella salina plant, std 7.5% mixed carotenoids)	6,300 mcg	*
Bilberry extract (Baccharium myrtillus fruit, 4:1)	15 mg	*
Calcium D-saccharate	25 mg	*
Calcium pyruvate	50 mg	*
Cat's claw extract (Uncaria tomentosa bark, 4:1)	100 mg	*
Citrus bioflavonoid complex	125 mg	*
Damiana extract (Turnera diffusa leaf 4:1)	75 mg	*
Fructo-oligosaccharides	200 mg	*
Ginger extract (Zingiber officinale root, 4:1)	200 mg	*
Grape seed extract (Vitis vinifera seed, std 95% proanthocyanidins)	25 mg	*
Grape skin extract (Vitis vinifera skin, 4:1)	25 mg	*
Hawthorn berry extract (Crataegus cuneata fruit 4:1)	35 mg	*
L-Lysine	250 mg	*
L-Taurine	250 mg	*
Lutein extract	50 mg	*
Lycopene	50 mg	*
Milk thistle extract (Silybum marianum seed, std 80% silymarin)	50 mg	*
Muir puama extract (Ptychopetalum lignum root, 4:1)	50 mg	*
N-Acetyl tyrosine	300 mg	*
PABA	50 mg	*
Pinebark extract (Pinus strobus bark, std 95%)	15 mg	*
Pygeum extract (Pygium africanum plant, 4:1)	40 mg	*
Red wine extract (Vitis vinifera fruit, std 15%)	25 mg	*
RoseOx® rosemary extract (Rosmarinus officinalis leaf, std 6% carnosic acid)	25 mg	*
Saw palmetto extract (Serenoa repens fruit, std 25% liposterols)	160 mg	*
Turmeric extract (Curcuma longa root, std 95% curcuminoids)	100 mg	*
Vegetable phytonutrient complex (vegetable extract: broccoli, cabbage, carrots, parsley leaf, tomatoes, peppermint, barley grass, beets)	250 mg	*

* Daily Value not established

Other ingredients: Gelatin, cellulose, calcium phosphate hydrous, stearic acid, magnesium stearate and silicon dioxide.
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AM-PM Formulas

Men's and women's AM-PM formulas contain a blend of vitamins, minerals and herbs specifically formulated to work with your body's natural daily rhythms, so that nutrients are available when the body needs them most.